

EYLeetrial.exh3

LEONARDO M. RAPADAS
United States Attorney
KARON V. JOHNSON
Assistant U.S. Attorney
Suite 500, Sirena Plaza
108 Hernan Cortez Avenue
Hagatna, Guam 96910
Telephone: (671) 472-7332
Telecopier: (671) 472-7334

Attorneys for the United States of America

IN THE UNITED STATES DISTRICT COURT
FOR THE TERRITORY OF GUAM

UNITED STATES OF AMERICA,)	CRIMINAL CASE NO. <u>08-00004</u>
)	
Plaintiff,)	
)	
vs.)	UNITED STATES SECOND
)	AMENDED EXHIBIT LIST
EUN YOUNG LEE,)	
aka Eun Young Cho,)	
aka Ina Lee,)	
MARCELINO J. LASERNA,)	
JOHN W.C. DUENAS,)	
MARY C. GARCIA,)	
JOSEPH PANGELINAN,)	
FRANCISCO SN KAWAMOTO, and)	
MARGARET B. UNTALAN,)	
)	
Defendants.)	
_____)	

COMES NOW the United States and hereby files with the Court the following proposed exhibits to be introduced in its case-in-chief:

Respectfully submitted this 16th day of May, 2008.

LEONARDO M. RAPADAS
United States Attorney
Districts of Guam and CNMI

By: /s/ Karon V. Johnson
KARON V. JOHNSON
Assistant U.S. Attorney

UNITED STATES' EXHIBIT LIST

<u>NO.</u>	<u>DESCRIPTION</u>	<u>Date Identified</u>	<u>Date Admitted</u>
1)	Applicable Guam Statutes, Attorney General's Opinion	_____	_____
2)	Licenses issued 1/01/02-1/18/06 by ITIN designation	_____	_____
3)	Licenses issued 1/01/02-1/18/06 by ITIN, address	_____	_____
4)	Licenses issued 1/01/02-1/18/06 by examination info	_____	_____
5)	MVD computer designated codes	_____	_____
6)	License exam history files, sorted by record key	_____	_____
7)	Photographs of meeting between Eun Young Lee and Mike Park, payment of \$1,000	_____	_____
8)	Photographs of meeting at MVD, Mike Park, Sane Mee Chun and Eun Young Lee 3/29/05	_____	_____
9)	MVD file of Sang Mee Chun	_____	_____
10)	MVD file of Mike Park	_____	_____
11)	Fraudulent ITIN letter given to Chun by Lee March 29, 2005	_____	_____
12)	Guam driver's licenses issued to Sang Mee Chun and Mike Park	_____	_____
13)	Redacted IRS W-7 applications and reports concerning certain ITINs	_____	_____
14)	Summary chart of license applications accepted by defendants between 2/20/04 and 11/28/05, showing applicant, driver's license number, ITIN, IRS report of each ITIN status, address on application, examiner, time and date application was entered into the MVD computer, date of written test, date of issuance of license	_____	_____
15)	Blank original ITIN letter used by IRS until 12/17/03	_____	_____
16)	Sample of ITIN letter issued by IRS after 12/17/03	_____	_____
17)	MVD file of Sung Min SHIN	_____	_____
18)	MVD file of Ki Cheol	_____	_____
19)	MVD file of Jung Soo YANG	_____	_____

1	20)	MVD file of Young Min KO	_____	_____
2	21)	MVD file of Geun Jae LEE	_____	_____
3	22)	MVD file of Seung Pill CHOI	_____	_____
4	23)	MVD file of Dong Pyo HONG	_____	_____
5	24)	MVD file of Mi Ra KIM	_____	_____
6	25)	MVD file of Deuk Soon CHOI	_____	_____
7	26)	MVD file of Chun Ja CHO	_____	_____
8	27)	MVD file of Jong Yeon HWANG	_____	_____
9	28)	MVD file of Jun Sung MIN	_____	_____
10	29)	MVD file of Hae Sook KANG	_____	_____
11	30)	MVD file of Jae Min LEE	_____	_____
12	31)	MVD file of Tae Kwun JUNG	_____	_____
13	32)	MVD file of Won Il KOH	_____	_____
14	33)	MVD file of In Hwan CHO	_____	_____
15	34)	MVD file of Hyuk Su KANG	_____	_____
16	35)	MVD file of Myung Sug KIM	_____	_____
17	36)	MVD file of Jae Hoan SEOK	_____	_____
18	37)	MVD file of Tae Ho KIM	_____	_____
19	38)	MVD file of Hak Ja PARK	_____	_____
20	39)	MVD file of Sung Kyu HONG	_____	_____
21	40)	MVD file of Ok Sun KIM	_____	_____
22	41)	MVD file of Tong Hun LEE	_____	_____
23	42)	MVD file of Tae Sung CHOI	_____	_____
24	43)	MVD file of Yu Suk KANG	_____	_____
25	44)	MVD file of Yeong Beom GIM	_____	_____
26	45)	MVD file of Ang Mi CHOI	_____	_____
27	46)	MVD file of Sung Jun HAN	_____	_____

1	47)	MVD file of Dong Sik JUNG	_____	_____
2	48)	MVD file of Ji Eon LEE	_____	_____
3	49)	MVD file of Min Chul LEE	_____	_____
4	50)	MVD file of Young Nam KIM	_____	_____
5	51)	MVD file of Jung Ja OH	_____	_____
6	52)	MVD file of Sang Jin PARK	_____	_____
7	53)	MVD file of Ha Young KIM	_____	_____
8	54)	MVD file of You Soon KIM	_____	_____
9	55)	MVD file of Sang C RYU	_____	_____
10	56)	MVD file of Jeong Min HAM	_____	_____
11	57)	MVD file of Jung Il CHAE	_____	_____
12	58)	MVD file of Haeng Hwa LEE	_____	_____
13	59)	MVD file of Sang Ho KIM	_____	_____
14	60)	MVD file of Mi Jung KIM	_____	_____
15	61)	MVD file of Dongmi KANG	_____	_____
16	62)	MVD file of Sung Hun KANG	_____	_____
17	63)	MVD file of Kil Ja LEE	_____	_____
18	64)	MVD file of Keun Seok BANG	_____	_____
19	65)	MVD file of Jin Woo PARK	_____	_____
20	66)	MVD file of Kyung Ja PARK	_____	_____
21	67)	MVD file of Jum Soo PARK	_____	_____
22	68)	Application summary chart for Laserna	_____	_____
23	69)	Application summary chart for Pangelinan	_____	_____
24	70)	Application summary chart for Untalan	_____	_____
25	71)	Application summary chart for Duenas	_____	_____
26	72)	Application summary chart for Kawamoto	_____	_____

- | | | | | |
|----|-----|---|-------|-------|
| 1 | 73) | Application summary chart for Garcia | _____ | _____ |
| 2 | 74) | Guam driver's licenses from arrested persons | _____ | _____ |
| 3 | 75) | Lee's affirmation of handwriting on applications | _____ | _____ |
| 4 | 76) | Laserna's affirmation of handwriting on applications | _____ | _____ |
| 5 | 77) | Untalan's affirmation of handwriting on applications | _____ | _____ |
| 6 | 78) | Kawamoto's affirmation of handwriting on applications | _____ | _____ |
| 7 | 79) | Duenas'a affirmation of handwriting on applications | _____ | _____ |
| 8 | 80) | Pangelinan's affirmation of handwriting on applications | _____ | _____ |
| 9 | 81) | Pangelinan's identification of ITIN letters | _____ | _____ |
| 10 | 82) | Garcia's affirmation of handwriting on applications | _____ | _____ |
| 11 | 83) | ITIN Letter given to Sang Ho Kim by Lee on 1/31/05 | _____ | _____ |
| 12 | 84) | ITIN Letter given to Jae Hoan Seok by Lee on 11/30/04 | _____ | _____ |